

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

SCHAFFER CORPORATION,

Plaintiff,

v.

Case No. 1: 12-CV-1204

VIRGINIA SQUARE OFFICE CORPORATION,

Defendant.

**MOTION FOR EXPEDITED CONSIDERATION
OF DECLARATORY JUDGMENT CLAIM**

Plaintiff, Schaffer Corporation (“Schaffer”), by counsel, and pursuant to Fed. R. Civ. P. 57 and 28 U.S.C. § 2201, respectfully requests that the Court give expedited consideration to Schaffer’s request for declaratory relief. As set forth more fully in the memorandum of law filed contemporaneously herewith, without expedited consideration of this matter Schaffer faces the untenable choice between simultaneously leasing office space in two separate buildings, with the resulting increased expenses, or losing the opportunity to move its operations to a new location with lower occupancy costs and enhanced efficiencies of operation. Accordingly, delay in the adjudication of this dispute will prejudice Schaffer’s rights under its existing lease and expose Schaffer to significant losses.

Respectfully submitted this 9th day of November, 2012.

SCHAFER CORPORATION

/s/ William F. Devine
William F. Devine (VSB No. 26632)
wdevine@williamsmullen.com
WILLIAMS MULLEN
1700 Dominion Tower
999 Waterside Drive
Norfolk, Virginia 23510
Tel: (757) 622-3366
Fax: (757) 629-0660

Anthony H. Anikeeff (VSB No. 20338)
aanikeeff@williamsmullen.com
WILLIAMS MULLEN
8300 Greensboro Drive
Suite 1100
McLean, VA 22102
Tel: (703) 760-5225
Fax: (703) 748-0244

Certificate of Service

I hereby certify that on the 9th day of November, 2012, I have electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and have sent a true and accurate copy by first class mail, postage prepaid, to the following:

Virginia Square Office Corporation
c/o LaSalle Investment Management, Inc.
ATTN: Allison McFaul, Vice President
100 East Pratt Street
Baltimore, MD 21202

/s/ William F. Devine
William F. Devine (VSB No. 26632)
wdevine@williamsmullen.com
WILLIAMS MULLEN
1700 Dominion Tower
999 Waterside Drive
Norfolk, Virginia 23510
Tel: (757) 622-3366
Fax: (757) 629-0660

Anthony H. Anikeeff (VSB No. 20338)
aanikeeff@williamsmullen.com
WILLIAMS MULLEN
8300 Greensboro Drive
Suite 1100
McLean, VA 22102
Tel: (703) 760-5225
Fax: (703) 748-0244